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March 25, 2010

VIA COURIER

Gail Mitchell, Deputy Director
Water Protection Division
U.S. EPA Region 4
Atlanta Federal Center
61 Forsyth Street
Atlanta, Georgia 30303-8960

**Re: October 6, 2009, Information Request – Section 308 of the Clean
Water Act - Dalton Utilities Land Application System**

Dear Ms. Mitchell:

Enclosed with this letter is information from Dalton Utilities in response to EPA's October 6, 2009, Section 308 of the Clean Water Act request (the "Request") addressed to Mr. Don Cope, President and CEO of Dalton Utilities. The enclosures are a letter dated March 25, 2010, with a certification signed pursuant to the Request and information responsive to various Paragraphs of Enclosure A of the Request, **Monthly Report and Analytical Reports**.

Please contact me if have any questions regarding the information supplied pursuant to the Request.

Sincerely,



Lee A. DeHihns, III

LAD:gba
Enclosures

LEGAL02/31578197v14



March 25, 2010

Ms. Gail Mitchell, Deputy Director
Clean Water Enforcement Branch
Water Protection Division
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW
Atlanta, GA 30303-8960

Re: Information Request Pursuant to Section 308 of the Clean Water Act
Monthly Progress Report

Dear Ms. Mitchell,

In accordance with the Information Request pursuant to Section 308 of the Clean Water Act dated October 6, 2009, Dalton Utilities is submitting this Monthly Progress Report to you.

Dalton Utilities submitted the Drinking Water Well Survey (Drinking Water Report), Drinking Water Well Monitoring Report, Composted Biosolids Monitoring Plan, Compost Use Review Report, and Well Construction Records on November 4, November 5, November 2, November 2, and October 23, 2009, respectively, in response to the aforementioned Information Request. Additionally, Dalton Utilities submitted revised versions of these documents on January 13, 2010, in accordance with comments from the United States Environmental Protection Agency (EPA) dated December 22, 2009.

As previously reported to you, Dalton Utilities has instituted the quarterly sampling of the seven private drinking water wells shown to have levels of Perfluorooctanoic Acid (PFOA) or Perfluorooctane Sulfonate (PFOS) above the contract laboratory's reporting limit or level of quantification and below the published public health advisory level as well as the two additional wells found to have levels of Perfluorinated Chemicals (PFC) other than PFOA or PFOS above the contract laboratory's reporting limit or level of quantification. The final analytical results of the third quarter of sampling are contained in Attachment A which is provided herein as a bound report titled Test America Laboratories, Inc. Analytical Report on Perfluorocarbon (PFC) Analysis Job # 280-764-1 which contains 613 pages. These locations are scheduled to be sampled again in May 2010.

In accordance with the Composted Biosolids Monitoring Plan, samples were collected of the three batches of compost aged approximately 6, 12, and 18 months at the time of the August 5, 2009, correspondence to Mr. Hom in October 2009. This sampling was repeated on February 17, 2010, and is scheduled to be repeated again in June 2010, in accordance with the four month interval stipulated in the aforementioned Information Request and Monitoring Plan. The final analytical sample results will be submitted to EPA as stipulated in the aforementioned information request after receipt.

In accordance with the Compost Use Review Report, Dalton Utilities has submitted to EPA all the final analytical reports received to date for these locations where compost was used as a soil amendment and private drinking water wells at the same location, if any. The final analytical results of background soil samples and additional quality control samples are contained in Attachment B which is provided herein as a bound report titled Test America Laboratories, Inc. Analytical Report on Perfluorocarbon (PFC) Analysis Job # 280-1118-2 which contains 357 pages.

Additionally, samples of the locations stipulated in the aforementioned Information Request's Enclosure A, Paragraph 5 were collected as required for the first two quarters and submitted to a contract lab for analysis. All analytical sample results received to date have been submitted to EPA. These locations are scheduled to be sampled for the final quarterly sample in April 2010.

As noted in our correspondence to Mr. Hom dated October 20, 2009, Dalton Utilities has partnered with the Sustainability Division of the Georgia Department of Natural Resources (DNR) and the University of Georgia (UGA) to conduct a survey to evaluate the current usage and potential levels of PFCs in the industrial discharges into our wastewater collection system. The sampling was completed in early February 2010 and Dalton Utilities is awaiting the results and final report on this project.

Further, Dalton Utilities has conducted additional sampling of the influent, untreated wastewater, and effluent, treated wastewater, from the Riverbend and Loopers wastewater treatment plants. The final analytical results of this sampling event are contained in Attachment C which is provided herein as a bound report titled Test America Laboratories, Inc. Analytical Report on Perfluorocarbon (PFC) Analysis Job # 280-1118-1 which contains 248 pages.

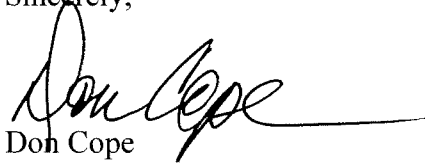
For your convenience, a summary of the samples identifications indicated in the attachments and the corresponding locations are included in Attachment D.

As always, Dalton Utilities will update you as the projects discussed with you proceed. If you have any questions, please contact me at 706-529-1091 or dcupe@dutil.com.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system,

or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

A handwritten signature in black ink, appearing to read "Don Cope", with a long horizontal flourish extending to the right.

Don Cope
President & CEO

Attachments (4)

- c: Mr. Allen Barnes, Georgia Environmental Protection Division (cover letter only)
Dr. Marlin Gottschalk, Sustainability Division Georgia Department of Natural Resources (cover letter only)
Dr. Bert Langley, Georgia Environmental Protection Division (cover letter only)
Lee A. DeHihns, Esq.

Summary of Sample Identifications and Locations

<u>Attachment</u>	<u>Job #</u>	<u>Type of Sample</u>	<u>Sample ID</u>	<u>Sample Location/Description</u>
A	280-764-1	Private Well Survey	743 Artis Charles Road	743 Artis Charles Road, Chatsworth GA 30705
A	280-764-1	Private Well Survey	3799 Browns Bridge Road	3799 Browns Bridge Road, Chatsworth GA 30705
A	280-764-1	Private Well Survey	705 Peek Road	705 Peek Road, Dalton GA 30721
A	280-764-1	Private Well Survey	175 Harrison Lane	175 Harrison Lane, Dalton GA 30721
A	280-764-1	Private Well Survey	5263 Hwy 225	5263 Hwy 225, Chatsworth GA 30705
A	280-764-1	Private Well Survey	5322 Hwy 225	5322 Hwy 225, Chatsworth GA 30705
A	280-764-1	Private Well Survey	1204 Brackett Ridge Road	1204 Brackett Ridge Road, Chatsworth GA 30705
A	280-764-1	Private Well Survey	300 Acorn Drive	300 Acorn Drive, Chatsworth GA 30705
A	280-764-1	Private Well Survey	4496 Hwy 225	4496 Hwy 225, Chatsworth GA 30705
B	280-1118-2	Compost Use	Trip Blank	Trip Blank
B	280-1118-2	Compost Use	Field Blank	Field Blank
B	280-1118-2	Compost Use	Equipment Blank	Equipment Blank
B	280-1118-2	Compost Use	03042010 #1	Background Soil - 1975 Hwy 52 East, Chatsworth, GA 30705
B	280-1118-2	Compost Use	03042010 #2	Background - 55 South Lake Drive, Chatsworth GA 30705
C	280-1118-1	Influent	I-3	Riverbend WWTP Influent
C	280-1118-1	Effluent	E-3	Riverbend WWTP Effluent
C	280-1118-1	Influent	I-4	Loopers WWTP Influent
C	280-1118-1	Effluent	E-4	Loopers WWTP Effluent